



# EISNER, LLP

October 26, 2022

**Via ECF**

The Honorable Valerie Caproni, U.S.D.J.  
United States District Court, S.D.N.Y.  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 240  
New York, NY 10007

**Re: Mayweather Promotions, LLC v. PAC Entertainment Worldwide, LLC  
Case No. 21-cv-4378 (VEC)**

Dear Judge Caproni:

My law firm, Eisner LLP, is counsel of record for Plaintiff and Counterclaim-Defendant Mayweather Promotions, LLC (“Promotions”) in the above-captioned case. On June 2, 2021, I entered my appearance in this matter *pro hac vice*. (Dkt. #13.) On February 7, 2022, my colleague Vanessa Destime entered her appearance. (Dkt. #56.)

I am writing Your Honor to respectfully request permission to attend the Status Conference, scheduled for Friday November 4, 2022, at 10:00 a.m. eastern, remotely via teleconference.

The grounds for my request include that Ms. Destime will be appearing on behalf of Promotions in person at the Status Conference; I reside in Los Angeles, California; my principal office is in Beverly Hills, California. The parties previously went before Your Honor at a status conference on October 7, 2022, where Your Honor ordered Promotions to file default judgment papers against Defendant/Counterclaim-Plaintiff PAC Entertainment Worldwide, LLC (“PAC”). The day before Promotions’ default judgment papers were due, PAC’s counsel entered his appearance in this matter and requested that your Honor schedule a status conference, which Your Honor granted. I was not aware that another status conference was going to be scheduled and therefore am unable to rearrange my schedule to attend the upcoming conference.

Counsel for Defendant/Counterclaim-Plaintiff PAC Entertainment Worldwide, LLC, Lee Brett Bergstein, has consented to this request.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Jeremiah Reynolds  
Jeremiah Reynolds  
Eisner, LLP  
Counsel for Plaintiff and Counterclaim-Defendant  
Mayweather Promotions, LLC